

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

GRANT WILLIAMS

Criminal No. 2:23-cr-10

INFORMATION MEMORANDUM

AND NOW comes the United States of America, by its attorneys, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and Brendan J. McKenna, Assistant United States Attorney for said District, and submits this Information Memorandum to the Court:

I. THE INFORMATION

A five-count Information was filed against the above-named defendant for alleged violations of federal law:

<u>COUNT</u>	<u>OFFENSE/DATE</u>	<u>TITLE/SECTION</u>
1-5	Failure to Make Entry in a Record by a Federal Firearms Dealer	18 U.S.C. § 922(m)

Between on or about:

- March 10, 2021, and March 3, 2022 (One)
- June 28, 2020, and January 13, 2022 (Two)
- March 6, 2020, and April 26, 2022 (Three)
- July 14, 2021, and October 21, 2021 (Four)
- June 23, 2020, and January 31, 2022 (Five)

II. ELEMENTS OF THE OFFENSES

As to Counts One through Five:

In order for the crime of failure to make entry in a record by a federal firearms dealer, in violation of 18 U.S.C. § 922(m), to be established, the government must prove all of the following essential elements beyond a reasonable doubt:

1. At the time of the charged act, the defendant was a federally licensed firearms dealer;
2. That the defendant failed to make an appropriate entry in the firearm records he was required by federal law to maintain; and,
3. That the defendant did so knowingly.

III. PENALTIES

As to each of Counts One through Five: Failure to Make Entry in a Record by a Federal Firearms Dealer (18 U.S.C. § 922(m)):

1. A term of imprisonment of not more than one (1) year (18 U.S.C. § 924(a)(3)(B)).
2. A fine of not more than \$100,000 (18 U.S.C. § 3571(b)(5)).
3. A term of supervised release of not more than (1) year (18 U.S.C. § 3583(b)(3)).

IV. MANDATORY SPECIAL ASSESSMENT

A mandatory special assessment of \$25.00 must be imposed at each count upon which the defendant is convicted, pursuant to 18 U.S.C. § 3013(a)(1)(A)(iii).

V. RESTITUTION

Not applicable in this case.

VI. FORFEITURE

Not applicable in this case.

Respectfully submitted,

CINDY K. CHUNG
United States Attorney

/s/ Brendan J. McKenna
BRENDAN J. MCKENNA
Assistant United States Attorney
PA ID No. 314315